## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY, et al.,	)	
Plaintiffs,	)	Civil Action No. 05-11150-DPW
vs.	)	Hon. Judge Douglas P. Woodlock
ABBOTT LABORATORIES,	)	
Defendant.	) )	

## MOTION FOR ADMISSION PRO HAC VICE OF KATHLEEN BARRY

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves that Kathleen Barry of Winston & Strawn LLP, 35 W. Wacker Drive, Chicago, IL 60601-9703, be admitted to appear on behalf of defendant Abbott Laboratories, and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

- 1. Ms. Barry is and has been a member in good standing of the bar of the State of Illinois since 2001 and the bar of the State of Michigan since 2002;
- 2. Ms. Barry is and has been a member in good standing of the bars of the following Federal Courts since the following dates:

Western District of Michigan	2002
Northern District of Illinois	2003
Sixth Circuit	2003
Seventh Circuit	2004
U.S. Supreme Court	2005

- 3. There are no disciplinary proceedings pending against Ms. Barry as a member of the bar in any jurisdiction;
- 4. Ms. Barry has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and
- 5. In further support of this motion, Ms. Barry has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves Ms. Barry's admission to practice before this Court *pro hac vice*.

Respectfully submitted,

/s/ Michael S. D'Orsi

Peter E. Gelhaar (BBO #188310) Michael S. D'Orsi (BBO #566960) DONNELLY, CONROY & GELHAAR, LLP One Beacon Street, 33d Floor Boston, MA 02108 (617) 720-2880

Dated: August 8, 2005

CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the

District of Massachusetts, I, Kathleen Barry, Esq., hereby certify that: (1) I am admitted to the

bars of the Courts set forth in the foregoing motion; (2) I am a member of the bar in good

standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary

proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am

familiar with the Local Rules of the United States District Court for the District of

Massachusetts.

Respectfully submitted,

/s/ Kathleen Barry, Esq.

Kathleen Barry, Esq.

Dated: August 8, 2005

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)** 

The undersigned hereby certifies he has conferred with counsel for John Hancock Life

Insurance Company, John Hancock Variable Life Insurance Company, and ManuLife Insurance

Company ("John Hancock") and John Hancock does not oppose this Motion.

/s/Michael S. D'Orsi Michael S. D'Orsi

Dated: August 8, 2005